

EXHIBIT C

Exhibit C – Defendants’ Proposed Constructions

Patent Rule 4-3 Joint Claim Construction Chart

No.	Claim Term / Phrase	Patent/Claims	Defendants’ Proposed Construction	Intrinsic Support	Extrinsic Support
1.	“interface”	’786 Patent, claims 1, 5, 6, 10, 14, 23, 57, 64, 86, 88	“a device that includes a microcontroller and that is a functionally and structurally separate component from the car stereo and housed separately from the car stereo, which integrates an external aftermarket device with a car stereo.”	Plaintiff’s proposed Construction is the same as that of Defendants with the sole exception of the phrase “and housed separately from the car stereo.” The intrinsic support for this phrase in the construction of interface includes: ’786 Patent: Figs. 1-2H; 3:12-42; 4:46-52; 5:15-37; 6:4-11. ’786 Prosecution History (“PH”): 09/11/2006 Response, p. 23-24 (statements including, but not limited to, “This is an entirely different concept than the interface of the present invention, which includes a physical interface device...”); 06/28/2007 Request for Continued Examination, p. 36; 09/06/2007 Response, p. 31-32, 34-35; 07/31/2008 Notice of Allowance, p. 2-3.	IPR2018-01142, Paper 8 (Nov. 26, 2018) at 17-18 and evidence cited therein (“the ‘car stereo’ and the ‘interface’ are housed together, there being no structural separation apparent”); IPR2018-01142, Paper 7 (Sep. 11, 2018) at 7-14 and evidence cited therein. ² IPR2016-00421, Paper 10 (Apr. 22, 2016) at 7-8, 16-17 and evidence cited therein. Blitzsafe’s contentions in this case. <i>Honda, Subaru, Ford and Dice Electronics</i> court’s claim construction opinion and order, court transcripts, and all extrinsic evidence cited by parties in <i>Honda, Ford and Dice Electronics</i> litigations.
2.	“integration subsystem”	’342 Patent, claims 49, 50, 53-57, 66, 70, 73, 74, 77-80, 94, 97, 99,	Subject to 35 U.S.C. § 112(6) (pre-AIA).	’786 Patent: Abstract; 4:25-67; Fig. 3; ³ 8:31-9:20, 9:45-67,	IPR2018-00090 (<i>see, e.g.,</i> Stern Decl. p. 10-11.); IPR2016-00418 (<i>see, e.g.,</i> Preliminary

² Defendants have identified documents from IPR proceedings as “extrinsic evidence”. However, the doctrine of prosecution disclaimer extends to statements made during IPR proceedings, and thus this evidence is considered “intrinsic.” *See Aylus Networks, Inc. v. Apple Inc.*, 856 F. 3d 1353, 1360 (Fed. Cir. 2017). Hence, any reference to the IPR proceedings under Extrinsic Evidence may also be included under Intrinsic Evidence.

³ Citation to figures includes any related text necessary to explain them; and vice-versa.

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		102, 103, 106, 113, 120	<p>Indefinite.</p> <p>Alternatively, for the independent claims: “subsystem including a microprocessor programmed to perform the flow-diagram of FIG. 24”;</p> <p>“subsystem”</p> <p>“system which is subordinate to another system and that is distinct from any other system (e.g., the car audio/video system)”</p>	<p>10:19-11:18, 11:30-12:14.</p> <p>’342 Patent: 1:64-2:17; 3:44-4:25; 5:6-62; 7:65-9:20; 12:58-24:67; 28:7-38:67; Figs. 3-24.</p> <p>’342 Prosecution History (“PH”): Original and Amended Claims; 11/30/2009 Resp. p. 2-36; 4/30/2010 Resp. p. 2-30; 8/15/2011 Resp. p. 3-28, 30-33; 1/29/2012 Resp. p. 2-40.</p>	<p>Rep. p 6-10; Decision at 14); IPR2016-00419 (<i>see, e.g.</i>, Decision at 14).</p> <p>IPR2016-01473, Paper 9 (Jan. 24, 2017) at 10-11 and evidence cited therein (“That is, regardless of where it is positioned, the integration subsystem is a system <i>distinct from any other system (e.g., the car audio/video system).</i>”); <i>see also Becton, Dickinson & Co. v. Tyco Healthcare Grp., LP</i>, 616 F.3d 1249, 1254 (Fed. Cir. 2010) (“Where a claim lists elements separately, ‘the clear implication of the claim language’ is that those elements are ‘distinct component[s]’ of the patented invention.”).</p> <p><i>Honda, Subaru, Ford and Dice Electronics</i> court’s claim construction opinion and order, court transcripts, and all extrinsic evidence cited by parties in <i>Ford and Dice Electronics</i> litigations (<i>e.g.</i>, Opening Markman Brief at 2-3, 6, 7 (D. NJ, 3:10-cv-01199 Dkt. 149); MPH Suppl. Markman Brief, at 3 (D. NJ, 3:10-cv-01199 Dkt. 222)); this Court’s claim construction opinion and order, court transcripts, and all extrinsic</p>

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					<p>evidence cited by parties in <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i>, Case No. 2:15-cv-1274-JRG-RSP (<i>e.g.</i>, Construction Memorandum Opinion and Order, Dkt. 146 and hearing transcript, Dkt. 118).</p> <p><i>Subsystem</i>, Wiley Electrical and Electronics Engineering Dictionary 755 (2004) (defining “subsystem” as a “system which is part of, or assists, a larger system”); <i>Subsystem</i>, Academic Press Dictionary of Science and Technology 2126 (1992) (defining “subsystem” as “a portion of a system that can be treated as a single element in the main system, but that can also be considered a distinct system itself”).</p> <p>Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term.</p> <p>Blitzsafe’s contentions in this case.</p>
3.	“formatted command” / “formatted control command” / “formatted	’786 Patent, claims 1, 57, 90 ’342 Patent: claim 53,	“new and different [control] command that is in a format compatible with the [after-	’786 patent at Abstract; 17:63-18:2; ’342 patent at 3:9-10; 18:7-9 (“For example, in this	IPR2018-01142, Paper 8 (Dec. 11, 2018) at 14-16 and evidence cited therein.

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	control signal”	57, 97	market audio device / portable device / MP3 player]”	step, a command issued from a HONDA car radio is converted into a format recognizable by an MP3 player manufactured by PANASONIC, Inc.”); 18:10-14; 22:50-59 (“resulting in a new command that is in a format compatible with the after-market CD player”); 24:15-23. '786 PH: 02/16/2007 Response, p. 26, 29-33; 06/28/2007 Request for Continued Examination, p. 26, 30-34; 09/06/2007 Response, p. 31-32, 35-37.	
4.	“after-market [audio/video] device”	'786 Patent, claims 1, 4, 5, 7, 8, 10, 23, 86	“[audio/video] equipment lacking specifically-designed wiring configuration for use only with custom designed connectors in the vehicle for that purpose.”.	'786 patent: Abstract; 1:5-59; 2:20-3:4; 4:25-5:55; 6:1-7:22; 8:16-9:44; 9:21-44; 11:19-29; 12:15-14:42; 17:22-18:9; 18:62-19:21; 20:44-54; Fig. 5. '786 PH: 9/5/2006 Resp. p. 2-22; 2/14/2007 Resp. p. 2-34; 6/28/2007 Resp. p. 2-37; 9/6/2007 Resp. 1-31; 4/21/2008 Resp. p. 1-32.	IPR2016-01746 (see, e.g., Preliminary Resp. p. 22-23) Marlowe Patent Holdings (MPH) Opening Markman Brief at 2-3, 6, 7 (D. NJ, 3:10-cv-01199 Dkt. 149); MPH Suppl. Markman Brief, at 3 (D. NJ, 3:10-cv-01199 Dkt. 222)
5.	“receives audio [video] generated by the portable device over the [or said] wireless communication link for playing on the car audio/video system”	'342 Patent, claims 49, 66, 73, 94	“receives decoded audio[video] signals produced by the portable device and transmitted using the [or said] wireless communication link for playing on the car audio/video system without further audio [video] decoding”	'342 Patent: 28:3-6; 33:62-64; 35:62-65; 38:37-40.	IPR2018-00090, Paper 15 (Apr. 20, 2018) at 19, 20, and evidence cited therein; IPR2018-00090, Paper 14 (Jan. 30, 2018) at 20, 21, 22, 28, IPR2018-00926, Paper 6 (Aug. 8, 2018) at 12, 13, 21, 22, and evidence cited therein; IPR2016-00419, Paper 15

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					(Aug. 31, 2016) at 4, 5, 6, and evidence cited therein; IPR2016-00118, Paper 1 (Oct. 30, 2015) at 17-24, and evidence cited therein; IPR2016-00118, Paper 11 (Feb. 5, 2016) at 21), and evidence cited therein; IPR2016-00418, Paper 10 (Apr. 11, 2016) at 22-23, and evidence cited therein; IPR2016-00418, Paper 20 (Sep. 30, 2016) at 14, 17, and evidence cited therein; IPR2016-00418, Paper 47 (Mar. 7, 2017) at 23, 30-33, 35, 36-40, 43-45; IPR2016-01476, preliminary Resp., p. 22-23; and other locations discussing decoding, and evidence cited therein; October 31, 2018 Claim Construction Hearing Transcript in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Civ. Action No. 2:17-CV-421-JRG-RSP (E.D. Texas) Dkt. No. 100; December 11, 2018 Claim Construction Memorandum Opinion and Order in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i> , Civ. Action No. 2:17-CV-421-JRG-RSP (E.D. Texas) Dkt. No. 109 at 15-18 and other locations discussing decoding, and evidence cited therein. <i>Blitzsafe Texas, LLC v. Honda</i>

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					<p><i>Motor Co., Ltd., et al.</i>, Case 2:15-cv-01274-JRG-RSP, Dkt. 164 (claim construction order) and Dkt. 394, Order on Toyota’s Motion <i>in Limine</i> No. 1 (Dkt. 326).</p> <p>Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term.</p>
6.	“channels audio generated by the portable device to the car audio/video system using the wireless communication link”	’342 Patent, claims 97, 120	“transmits decoded audio signals produced by the portable device, and received by the integration subsystem, to the car audio/video system using the wireless communication link for playing on the car audio/video system without further audio decoding”.	’342 Patent: 28:3-6; 33:62-64; 35:62-65; 38:37-40.	<p>IPR2018-00090, Paper 15 (Apr. 20, 2018) at 19, 20, and evidence cited therein; IPR2018-00090, Paper 14 (Jan. 30, 2018) at 20, 21, 22, 28, IPR2018-00926, Paper 6 (Aug. 8, 2018) at 12, 13, 21, 22, and evidence cited therein; IPR2016-00419, Paper 15 (Aug. 31, 2016) at 4, 5, 6, and evidence cited therein; IPR2016-00118, Paper 1 (Oct. 30, 2015) at 17-24, and evidence cited therein; IPR2016-00118, Paper 11 (Feb. 5, 2016) at 21), and evidence cited therein; IPR2016-00418, Paper 10 (Apr. 11, 2016) at 22-23, and evidence cited therein; IPR2016-00418, Paper 20 (Sep. 30, 2016) at 14, 17, and evidence cited therein; IPR2016-00418, Paper 47 (Mar. 7, 2017) at 23, 30-33, 35,</p>

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					<p>36-40, 43-45; IPR2016-01476, preliminary Resp., p. 22-23; and other locations discussing decoding, and evidence cited therein; October 31, 2018 Claim Construction Hearing Transcript in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Civ. Action No. 2:17-CV-421-JRG-RSP (E.D. Texas) Dkt. No. 100; December 11, 2018 Claim Construction Memorandum Opinion and Order in <i>Blitzsafe Texas, LLC v. Subaru Corp., et al.</i>, Civ. Action No. 2:17-CV-421-JRG-RSP (E.D. Texas) Dkt. No. 109 at 15-18 and other locations discussing decoding, and evidence cited therein.</p> <p><i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd., et al.</i>, Case 2:15-cv-01274-JRG-RSP, Dkt. 164 (claim construction order) and Dkt. 394, Order on Toyota’s Motion <i>in Limine</i> No. 1 (Dkt. 326).</p> <p>Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term.</p> <p>Blitzsafe’s contentions in this case.</p>

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7.	“a first pre-programmed code portion for remotely controlling the after-market audio device using the car stereo by receiving a control command from the car stereo through said first connector in a format incompatible with the after-market audio device, processing the received control command into a formatted command compatible with the after-market audio device, and transmitting the formatted command to the after-market audio device through said second connector for execution by the after-market audio device”	’786 Patent, claim 1	<p>Subject to 35 U.S.C. § 112(6) (pre-AIA).</p> <p><u>Function</u>: “remotely controlling the after-market audio device using the car stereo by receiving a control command from the car stereo through said first connector in a format incompatible with the after-market audio device, processing the received control command into a formatted command compatible with the after-market audio device, and transmitting the formatted command to the after-market audio device through said second connector for execution by the after-market audio device.”</p> <p><u>Structure</u>: a microprocessor programmed to execute the code portion shown in Table 1.</p>	<p>’786 Patent: Fig. 3; 8:31-64; 17:22-18:4; 18:62-19:3.</p> <p>’342 Patent: 22:7-24:47.</p> <p>’786 PH: 9/6/2007 Resp. p. 1-37.</p>	<p>IPR2016-01472 (<i>e.g.</i>, Preliminary Resp. p. 8-16); IPR2016-01448 (<i>e.g.</i>, Preliminary Resp. p. 16-23).</p> <p>Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term.</p> <p>Blitzsafe’s contentions in this case.</p>
8.	“a first pre-programmed code portion for generating a device presence signal and transmitting the signal to the car stereo to maintain the car stereo in an operational state”	’786 Patent, claim 57	<p>Subject to 35 U.S.C. § 112(6) (pre-AIA).</p> <p><u>Function</u>: “generating a device presence signal and transmitting the signal to the car stereo to maintain the car stereo in an operational state / generating a device presence signal and transmitting the signal to the car</p>	<p>’786 Patent: 1:60-64; 2:29-35; 4:47-56; 8:31-64; 12:15-64; 13:12-29; 13:59-14:13; 14:48-53; 15:35-67; 16:12-45; 16:57-17:1; 17:22-19:3; 20:5-10; 20:19-35; Figs. 3; 2A-H; 4A-G; 11-12.</p> <p>’786 PH: 6/28/2007 Resp. p. 1-</p>	<p>IPR2016-01472 (<i>e.g.</i>, Preliminary Resp. p. 8-16); IPR2016-01448 (<i>e.g.</i>, Preliminary Resp. p. 16-23); IPR2016-00422 (<i>e.g.</i>, Preliminary Resp. p. 5-6, 21-22); IPR2016-00421 (<i>e.g.</i>, Preliminary Resp. p. 6-7, 21-</p>

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	“a first pre-programmed code portion for generating a device presence signal and transmitting the signal to the car stereo through said first electrical connector to maintain the car stereo in an operational state responsive to signals generated by the after-market video device”	’786 Patent, claim 86	stereo through said first electrical connector to maintain the car stereo in an operational state responsive to signals generated by the after-market video device.” <u>Structure</u> : Indefinite for failing to disclose corresponding structure	36; 9/6/2007 Resp. p. 1-37. ’342 Patent: 2:18-23; 2:67-3:6; 8:63-9:7; 16:50-62; 17:46-54; 18:31-35; 20:9-15; 20:57-63; 21:39-45; 22:7-24:47; 25:49-54; 25:63-26:11; 29:16-21; FIG. 4A-4C; U.S. Patent Application 11/071,667.	24); IPR2018-01204. Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term. <i>Honda, Subaru, Ford and Dice Electronics</i> court’s claim construction opinion and order, court transcripts, and all extrinsic evidence cited by parties in <i>Honda, Ford and Dice Electronics</i> litigations. Blitzsafe’s contentions in this case.
9.	“a second pre-programmed code portion for receiving	’786 Patent, claim 1	Subject to 35 U.S.C. § 112(6) (pre-AIA). <u>Function</u> : “receiving data from	’786 Patent: Fig. 3; 8:31-64; 12:15-64; 17:22-19:3.	Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with

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	data from the after-market audio device through said second connector in a format incompatible with the car stereo, processing the received data into formatted data compatible with the car stereo, and transmitting the formatted data to the car stereo through said first connector for display by the car stereo”		the after-market audio device through said second connector in a format incompatible with the car stereo, processing the received data into formatted data compatible with the car stereo, and transmitting the formatted data to the car stereo through said first connector for display by the car stereo.” <u>Structure</u> : a microprocessor programmed to execute the code portion shown in Table 2.	’342 Patent: 22:7-24:47. ’786 PH: 9/6/2007 Resp. p. 1-37. <i>See also</i> no. 8.	this claim term. Blitzsafe’s contentions in this case. <i>See also</i> no. 8.
10.	“a third code portion for receiving data from the video device incompatible with the car stereo, processing received data into formatted data compatible with the car stereo, and transmitting formatted data . . .”	’786 Patent, claim 91	Subject to 35 U.S.C. § 112(6) (pre-AIA). <u>Function</u> : “receiving data from the video device incompatible with the car stereo, processing received data into formatted data compatible with the car stereo, and transmitting formatted data.” <u>Structure</u> : a microprocessor programmed to execute the code portion shown in Table 2.	’786 Patent: Fig. 3; 8:31-64; 17:22-19:3. ’342 Patent: 22:7-24:47. ’786 PH: 9/6/2007 Resp. p. 1-37. <i>See also</i> no. 8.	Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term. Blitzsafe’s contentions in this case. <i>See also</i> no. 8.
11.	“a second pre-programmed code portion for remotely controlling the MP3 player using the car stereo by receiving a control command from the car stereo through	’786 Patent, claim 57	Subject to 35 U.S.C. § 112(6) (pre-AIA). Function: “remotely controlling the MP3 player using the car stereo by receiving a control command from the car stereo through said first electrical connector in a format	’786 Patent: Fig. 3; 8:31-64; 17:22-18:4; 18:62-19:3. ’342 Patent: 22:7-24:47. ’786 PH: 9/6/2007 Resp. p. 1-37.	IPR2016-01472 (<i>e.g.</i> , Preliminary Resp. p. 8-16); IPR2016-01448 (<i>e.g.</i> , Preliminary Resp. p. 16-23). Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with

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	said first electrical connector in a format incompatible with the MP3 player, processing the control command into a formatted control command compatible with the MP3 player, and transmitting the formatted control command to the MP3 player through said second electrical connector for execution by the MP3 player”		incompatible with the MP3 player, processing the control command into a formatted control command compatible with the MP3 player, and transmitting the formatted control command to the MP3 player through said second electrical connector for execution by the MP3 player” Structure: a microprocessor programmed to execute the code portion shown in Table 1.	<i>See also</i> no. 8.	this claim term. Blitzsafe’s contentions in this case. <i>See also</i> no. 8.
12.	“a third pre-programmed code portion for switching to one or more auxiliary input sources connected to said third electrical connector”	’786 Patent, claim 1	Subject to 35 U.S.C. § 112(6) (pre-AIA). Function: “switching to one or more auxiliary input sources connected to said third electrical connector.” Structure: a microprocessor programmed to execute the flow-diagram of ref. no. 198 of Fig. 4D as described in col. 14:43-48, 15:13-23, and 316 of Fig. 5 as described in col. 19:48-52.	’786 patent: Figs. 3, 4D (<i>e.g.</i> , 198) and 5 (<i>e.g.</i> , 316), 6 and 7; 4:11-14; 7:46-61, 14:43-48; 8:31-64; 15:13-23; 17:22-18:4; 18:62-19:7; 19:48-52. ’786 PH: 9/6/2007 Resp. p. 1-37. <i>See also</i> no. 8.	Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term. Blitzsafe’s contentions in this case. <i>See also</i> no. 8.
13.	“video information”	’786 Patent, claims 10, 86	Plain and ordinary meaning.	’786 Patent, 2:22–52; 8:22–27; 20:44–54. 10/316,961, Response to Office Action dated June 5, 2006 at 21; 10/316,961, Response to Office Action	

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				dated November 14, 2006 at 26-38; 10/316,961, Response to Office Action dated July 12, 2007 at 34, 35.	
14.	“connector electrically connectable to” / “electrical connector”	’786 Patent, claims 1, 2, 4, 5, 57, 86	“a port that links separate components”	Throughout the ’786 patent, <i>see, e.g.</i> , at 8:31-64, 9:22-44 (“connectors are provided, illustratively indicated as ports... ports could be embodied by any suitable electrical connector known in the art.”).	IPR2018-01142, Paper 8 (Dec. 11, 2018) at 19-21, and evidence cited therein.
15.	“a second code portion for receiving a control signal from the car . . . , processing a received control signal . . . , and transmitting the formatted control signal . . .”	’786 Patent, claim 90	Subject to 35 U.S.C. § 112(6) (pre-AIA). Function: “receiving a control signal from the car stereo in a format incompatible with the video device, processing a received control signal into a formatted control signal compatible with the video device, and transmitting the formatted control signal to the video device for execution thereby” Structure: a microprocessor programmed to execute the code portion shown in Table 1.	’786 Patent: Fig. 3; 8:31-64; 17:22-18:4; 18:62-19:3. ’342 Patent: 22:7-24:47. ’786 PH: 9/6/2007 Resp. p. 1-37. <i>See also</i> no. 8.	IPR2016-01472 (<i>e.g.</i> , Preliminary Resp. p. 8-16); IPR2016-01448 (<i>e.g.</i> , Preliminary Resp. p. 16-23). Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term. Blitzsafe’s contentions in this case. <i>See also</i> no. 8.
16.	“a third code portion for receiving data from the MP3 player . . . , processing received data . . . , and transmitting formatted	’786 Patent, claim 60	Subject to 35 U.S.C. § 112(6) (pre-AIA). Function: “receiving data from the MP3 player in a format incompatible with the car stereo,	’786 Patent: Fig. 3; 8:31-64; 17:22-19:3. ’342 Patent: 22:7-24:47. ’786 PH: 9/6/2007 Resp. p. 1-	Defendants may rely on the expert testimony of Dr. Thomas Matheson in connection with this claim term. Blitzsafe’s contentions in this

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	data . . .”		processing received data into formatted data compatible with the car stereo, and transmitting formatted data to the car stereo for display thereby” Structure: a microprocessor programmed to execute the code portion shown in Table 2.	37. <i>See also</i> no. 8.	case. <i>See also</i> no. 8.